

412452



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**SESTER AND SON
KIRKLAND, ILLINOIS
ILD 106 923 360**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

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EXECUTIVE SUMMARY

Resource Applications, Inc. (RAI) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Sester and Son (SS) facility in Kirkland, DeKalb County, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The SS facility was started as a gas station in the early 1940s. The original owner was Warren Carlson. Mr. Norman Sester acquired the facility in 1972. The SS facility began reclaiming lead/acid batteries in 1972. The facility managed the following waste streams: whole lead/acid batteries, lead cells and scrap lead from batteries, plastic battery casings, and sulfuric acid (H_2SO_4). An EPA Notification of Hazardous Waste Activity form or a Part A permit application was never filed for the SS facility. If waste codes were listed they would probably have been D008 for lead and D002 for sulfuric acid. SS operated the lead/acid battery reclaiming at this location from 1972 until 1985. Since 1985, the facility has been used to store equipment and machinery for resale. Hazardous materials and constituents are believed to be located on site. The facility building and parcel occupy around 8,000 square feet, approximately 100 feet by 80 feet, in a mixed-use area and employed about two or three people when it was in operation. The facility is currently nonregulated. The Illinois Environmental Protection Agency (IEPA) treated the SS facility as if it was an interim status treatment, storage, or disposal (TSD) facility. If the SS facility was reclaiming lead/acid batteries today it would be regulated according to 40 Code of Federal Regulations (CFR) Part 266.80, Subpart G. All sections of 40 CFR Part 266.80 went into effect on July 5, 1985. Prior to this amendment to 40 CFR Part 266, lead/acid battery reclaiming facilities were not regulated by EPA. A January 10, 1985 RCRA Inspection Report for Interim Status Standards indicated that lead/acid battery reclaiming operations at the SS facility had ceased prior to the inspection. Lead/acid battery reclaiming operations could not resume until operating permits were obtained from IEPA Division of Air Pollution Control (DAPC) and Division of Water Pollution Control (DWPC). File information appears to indicate that lead/acid battery reclamation did not resume any time after January 1985.

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The SS facility was used to store whole lead/acid batteries for sale to other reclaimers. Under 40 CFR Part 266.80 facilities which store spent batteries, but do not reclaim them, are not subject to regulation. The SS facility should not have been regulated as a TSD facility. In a telephone conversation between RAI and IEPA on December 15, 1992, IEPA indicated that the SS facility was indeed not subject to RCRA interim status standards. IEPA also indicated that since the facility was exempt from RCRA interim status standards, completion of closure activities was not required.

In the past, the SS facility had several compliance problems. Currently there are no RCRA violations existing at this facility. The past compliance violations were related to facility closure, waste management at the facility, and permit negligence. On April 21, 1986, IEPA referred the SS facility to the EPA for a Compliance Order. EPA concluded that a Compliance Order was not appropriate on May 22, 1986. This conclusion was based on the determination that excavated limestone/soil piles were not a waste management landfill and that the wastes in the piles were exempt from regulation by the language of 35 Illinois Administrative Code (IAC) 721.106, which was in effect during the time that the piles were present.

The PA/VSI identified the following two SWMUs at the facility:

Solid Waste Management Units

1. Lead/Acid Battery Reclamation Area
2. Sulfuric Acid Neutralization Tanks

No areas of concern were identified at the SS facility.

Currently, there is a moderate potential for further releases to ground water from SWMU 1 because some soil contamination may still exist. The spring water table is generally one to three feet below the surface in Elburn silt loam soils. In the past it is possible that there were releases to the ground water from on-site activities. During the facility's operation it is possible that the ground water in the facility area could have been contaminated with lead and sulfuric acid. This is due to past releases to soil as a result of the lack of organized waste management at the facility, and the fact that there was inadequate containment of hazardous substances when the facility was in operation.

Ground water monitoring has not been conducted at this facility. The geology underneath the SS facility consists of approximately 60 feet of glacial drift.

Currently, there is a moderate potential for a release to surface water from SWMU 1. In the past, IEPA DWPC took surface water runoff samples in a ditch that runs along the north side of the facility into Bull Run stream. These surface water samples revealed lead levels of 30 milligrams/liter (mg/L) and 75 mg/L. A field pH screening on October 9, 1984, showed on-site ponded surface water registered a pH between 1 and 2. Soil remediation was conducted, but some residual contamination may still exist.

There is currently a moderate potential for a release of hazardous constituents to the air. In the past there may have been releases of hazardous constituents to the air. Lead cells from lead/acid batteries were stored outside on the ground with no containment. Area residents complained about red lead oxide (Pb_3O_4) flowing from piles of lead plates that were on-site. Red lead oxide was not observed on-site during the VSI.

There has been a release to on-site soils at the SS facility. An IEPA field pH screening on October 9, 1984 in on-site ponded surface water registered a pH between 1 and 2. In a response dated January 2, 1985, Mr. Sester indicated that the lead/acid batteries had been placed on skids and that four to six inches of run off contaminated limestone/soil were excavated and removed from the site to USS Lead in East Chicago, Indiana. In a follow-up inspection conducted on January 10, 1985, piles of excavated limestone/soil from this area were observed in the northwest corner of the site. An IEPA analysis of a sample taken during the inspection showed a total lead concentration of 29,470 milligrams per kilogram (mg/kg) in the limestone and soil material. Piles of excavated limestone/soil were not on site during the VSI. These piles of excavated limestone/soil were not RCRA regulated under 40 CFR Part 261 because the piles went for reclamation and the area is considered part of SWMU 1. Hazardous materials and constituents are believed to still be located on site.

The nearest surface water body, Bull Run stream, is located 400 feet west of the facility and is used for agricultural and recreational purposes. Bull Run stream is a tributary to the South Branch of the Kishwaukee River. The South Branch of the Kishwaukee River flows west and north and is located approximately 0.3 mile north of the SS facility. The South Branch of the Kishwaukee River

flows west then north of Kirkland, Illinois and joins the Kishwaukee River approximately 10 miles downstream. Ground water is used as a municipal water supply. The municipal water well is located less than 0.25 mile east of the facility. This well draws from 636 feet below the surface from a sandstone aquifer. This well is located downgradient of the facility. Sensitive environments are not located on site. The nearest sensitive environment is a series of wetlands located northwest and northeast of the facility along the banks of the South Branch of the Kishwaukee River. There are many of these palustrine wetlands located within 2 miles of the facility. There are no national parks, forest preserves, or habitats of endangered species within 2 miles of the SS facility.

Although the facility is exempt from RCRA interim status standards, corrective actions for the facility may be pursued under regulations of the CERCLA program. RAI recommends that ground water and soil sampling be conducted at SWMU 1. Also, RAI recommends surface water sampling for Bull Run stream. Ground water sampling is recommended because there has been a release to on-site soils and because the spring water table is generally 1 to 3 feet below the surface in Elburn silt loam soils. Ground water, surface water, and on-site soil sampling is recommended because of the history of releases to soil and surface water at the facility. RAI recommends that a fence be constructed around the facility to limit the accessibility to the area. For SWMU 2, RAI recommends no further action because the tanks have been removed from the facility and there were no documented releases from them.

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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 team member, provided the necessary assistance to complete the PA/VSI activities for the Sester and Son (SS) facility.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the SS facility (EPA Identification No. ILD 106 923 360) in Kirkland, DeKalb County, Illinois. The PA was completed on June 17, 1992. RAI gathered and reviewed information from the Federal Emergency Management Agency (FEMA), Illinois Department of Energy and Natural Resources (IDENR), Illinois Environmental Protection Agency (IEPA), National Oceanic and Atmospheric Administration (NOAA), United States Department of Agriculture (USDA), United States Department of Commerce (USDC), United States Department of the Interior (USDI), United States Geological Survey (USGS), and from EPA Region 5 RCRA files. The VSI was conducted on June 18, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. RAI identified two SWMUs at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and 13 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

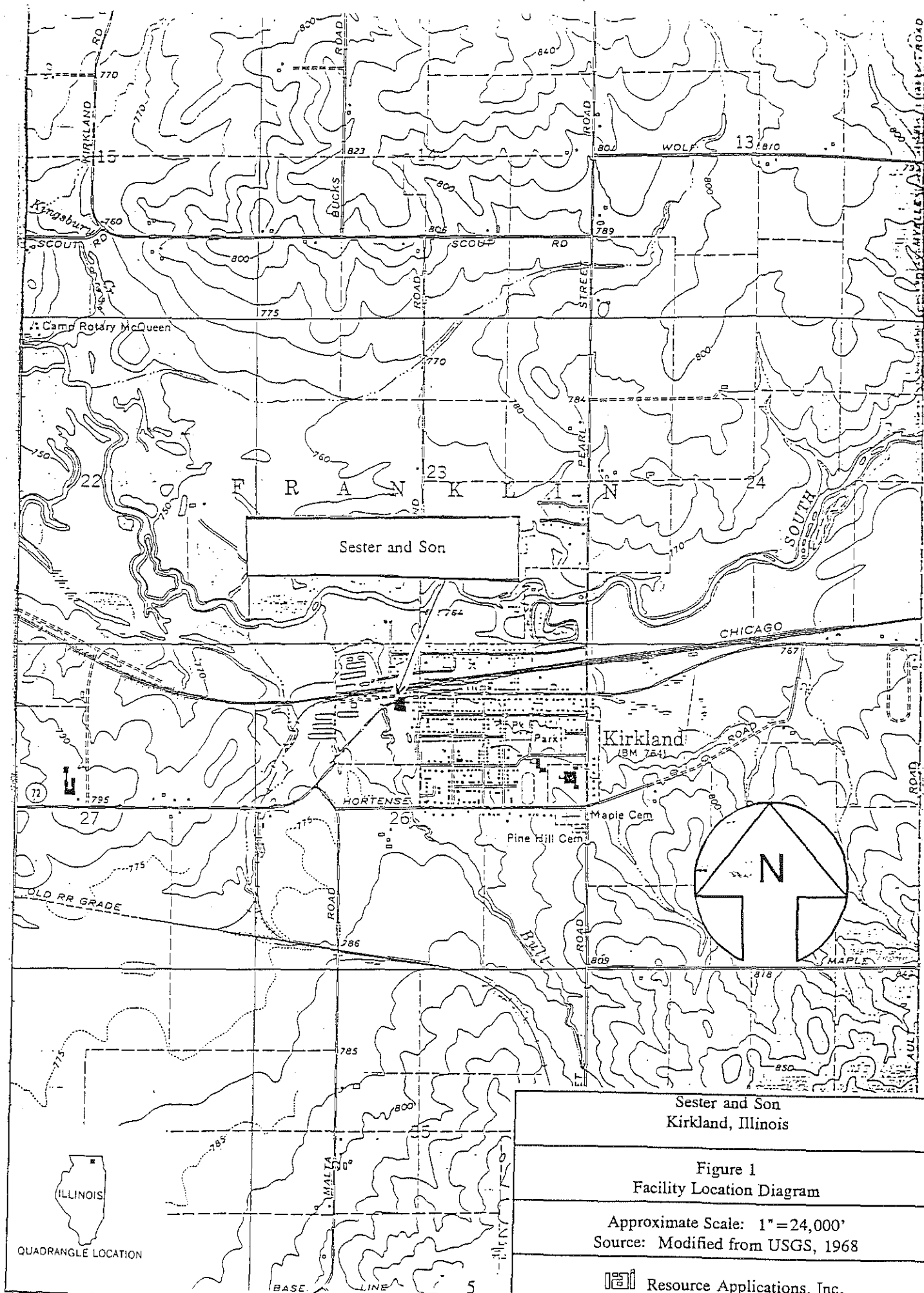
The Sester and Son (SS) facility is located on State Route 72 in Kirkland, DeKalb County, Illinois. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 42°5'26" N and longitude 88°51'12.5" W). The facility building and parcel of land occupy 8,000 square feet in an industrial, commercial, and residential mixed-use area.

The SS facility is bordered on the north by State Route 72 and then Kirkland Feed and Grain, on the west by the Kirkland Saw Mill, on the south by Rowin Street and a residence, and on the east by a building owned by the Kirkland Fire Department and then by South Sixth Street. The nearest school, Kirkland Community School, is located six blocks east and three blocks south of the facility. The nearest residence is approximately 60 feet south of the facility across Rowin Street.

2.2 FACILITY OPERATIONS

Sester and Son was a lead/acid battery reclamation facility. The facility was acquired by Norman Sester as a gasoline station in 1972. The facility was originally owned by Warren Carlson and was a gas station that began operations in the early 1940s. Mr. Sester switched operations to reclaiming industrial and automotive lead/acid batteries from 1972 to 1985. The facility reclaimed or sold an average of 12,000 batteries per year. The SS facility employed two or three people when it was operating as a lead/acid battery reclaimer.


SWMU 1, the Lead/Acid Battery Reclamation Area, is identified as the parcel of land and building that occupy approximately 8,000 square feet, except for the sulfuric acid neutralization tanks. SWMU 1 is defined as this area because the lead/acid battery reclamation operations changed locations through history and exact locations could not be determined during the VSI.



Sester and Son
Kirkland, Illinois

Figure 1
Facility Location Diagram

Approximate Scale: 1" = 24,000'
Source: Modified from USGS, 1968

 Resource Applications, Inc.

Solid wastes generated from facility operations and the SWMUs where they were managed are discussed in detail in Section 2.3.

2.3 WASTE GENERATION AND MANAGEMENT

The primary waste streams generated at the SS facility were whole lead/acid batteries, lead cells and scrap from batteries, plastic battery casings, and sulfuric acid (H_2SO_4). An EPA Notification of Hazardous Waste Activity form or a Part A Permit application was never filed for the SS facility. If waste codes were listed they would probably have been D008 for lead and D002 for sulfuric acid. The SWMUs and their current status are identified in Table 1. The location of the SWMUs in relation to the facility layout are shown in Figure 2. Wastes generated at the facility are summarized in Table 2. Facility generation and management of both hazardous and nonhazardous wastes are discussed below.

The SS facility did not have any established management practices. Batteries were processed all over the property including outside on open ground. The locations of the individual operations depended on the volume of batteries being reclaimed at the time. The SS facility reclaimed or sold an average of 12,000 batteries per year. Whole lead/acid batteries were originally stored on the ground outside or on the cement floor inside the building. Later, the batteries were stored on pallets inside or outside the building. Lead plates and scrap parts were stored in piles outside the building or in semi-trailers that were uncovered. Ultimately, the lead plates and parts were sold to two lead smelters; National Lead in Chicago, Illinois and USS Lead in East Chicago, Indiana. Whole plastic casings and shredded plastic casings were stored in piles outside the building or in uncovered semi-trailers. The shredded plastic casings were sold through the lead smelters to M.A. Polymers. Sulfuric acid was not stored at the facility, but it was neutralized in tanks (SWMU 2) and discharged into the Kirkland Sewer System.

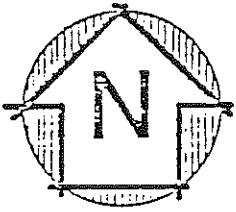
First, the batteries were opened using a circular saw or other cutting device in the area of SWMU 1. Then the acid was drained from the batteries and neutralized on site in tanks. The lead plates were removed from the casings and stored in flatbed trucks or on the ground (SWMU 1). The residual contents, i.e. lead oxide, lead connectors, lead lugs, and plastic casings, were shredded in a hammermill in the area of SWMU 1. The shredded material was then put into a flotation tank in

TABLE 1
SOLID WASTE MANAGEMENT UNITS

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit^a</u>	<u>Status</u>
1	Lead/Acid Battery Reclamation Area	No	Inactive, but has not completed closure. This unit is exempt from RCRA regulation. IEPA treated the SS facility as an interim status treatment, storage, or disposal (TSD) facility. Due to health and financial difficulties incurred by Mr. Sester, closure activities ceased at this facility.
2	Sulfuric Acid Neutralization Tanks	No	Inactive, but has not completed closure. This unit is exempt from regulation. IEPA treated the SS facility as an interim status TSD facility. Due to health and financial difficulties incurred by Mr. Sester, closure activities ceased at the facility.

Note:

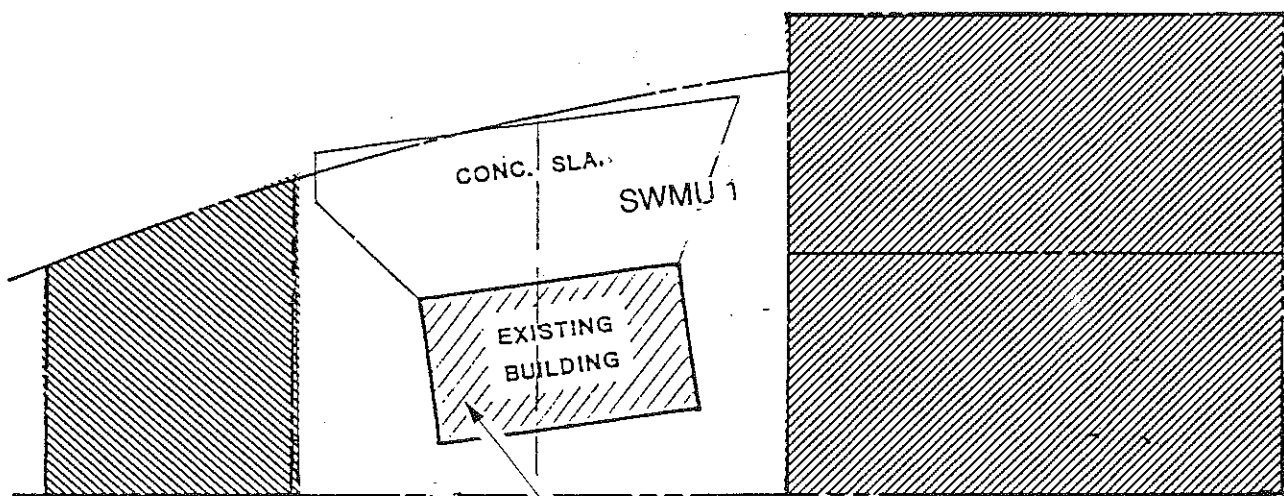
^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



1" = 40'

HWY

72



ROWIN

SWMU 2

STREET

STREET

6TH

SOUTH

Solid Waste Management Unit (SWMU)

1. Lead/Acid Battery Reclamation Area
2. Sulfuric Acid Neutralization Tank

Sester and Son
Kirkland, Illinois

Figure 2
FACILITY LAYOUT/SWMU LOCATIONS

Scale: 1"=40'
Source: Modified from Engineering Enterprises, 1985


 Resource Applications, Inc.

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code</u>	<u>Source</u>	<u>Solid Waste Management Unit</u>
Whole Lead/Acid Batteries	Lead/Acid Battery Reclamation	1
Lead Cells and Scrap Lead/(D008)	Lead/Acid Battery Reclamation	1
Plastic Battery Casings/(D008)	Lead/Acid Battery Reclamation	1
Sulfuric Acid/(D002)	Lead/Acid Battery Reclamation	2

SWMU 1 to separate the lead parts from the plastic. Not all batteries were reclaimed; some were sold whole to lead reclaimers. Some of these operations occurred outdoors on soils of the SS facility.

The original on-site acid neutralization system consisted of an outdoor inground closed steel tank filled with limestone which was connected to the Kirkland sewer system. This neutralization system was later modified by the addition of an indoor inground stainless steel capture tank which was open to the air. SWMU 2, the Sulfuric Acid Neutralization Tanks, is identified as the indoor inground stainless steel capture tank and the outdoor inground steel tank filled with limestone. During the VSI, the location of the former indoor inground stainless steel capture tank was determined, but RAI was not able to determine the location of the former outdoor inground steel tank filled with limestone. The stainless steel capture tank was hooked up to the steel limestone tank. The stainless steel capture tank was located indoors next to battery cutting or battery storage operations. Acid from the batteries was drained directly into this tank. Neutralization was performed in the stainless steel capture tank before the acid went to the steel limestone tank. The stainless steel capture tank neutralized the acid with potash and later with aqueous ammonia. Due to valving problems, the outdoor steel limestone tank was removed and neutralization was conducted solely in the stainless steel capture tank. The valving problems did not result in a release. The stainless steel capture tank was then connected to the Kirkland Sewer.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the facility.

In 1983, the IEPA Division of Water Pollution Control (DWPC), took surface water runoff samples in a ditch that runs along the north side of the facility into Bull Run stream. These surface water samples revealed lead levels of 30 mg/L and 75 mg/L (IEPA, 1983e; 1983f; 1983g). A field pH screening in on-site ponded surface water registered a pH between 1 and 2 (IEPA 1984a).

In the past there may have been a release of hazardous constituents to the air. Lead cells from lead/acid batteries were stored outside of the building on the ground with no containment. Also,

IEPA received complaints from area residents that red lead oxide (Pb_3O_4) was blowing from the piles of lead plates that were on site. Red lead oxide was not observed on-site during the VSI.

There has been a release to on-site soils at the SS facility. At a field pH screening on October 9, 1984, on-site ponded liquid registered a pH between 1 and 2 (IEPA, 1984a). This acidic surface water may have been straight acid from lead/acid battery reclamation. In a response to an IEPA compliance inquiry letter (CIL) dated October 29, 1984, Mr. Sester indicated that the lead/acid batteries had been placed on skids and that 4 to 6 inches of contaminated limestone gravel and soil were excavated and removed from the site to USS Lead in East Chicago, Indiana (IEPA, 1984a; Sester, 1985a). In a follow-up inspection conducted on January 10, 1985, piles of excavated gravel limestone and soil from this area were observed in the northwest corner of the site (IEPA, 1985a). These piles are part of the Lead/Acid Battery Reclamation Area (SWMU 1). An IEPA analysis of a sample taken during the inspection showed a total lead concentration of 29,470 milligrams per kilogram (mg/kg) in the gravel limestone and soil material (IEPA, 1985a). The extraction procedure (EP) toxicity test was not performed on the sample from the excavated pile. These piles of excavated limestone/soil were not RCRA regulated under 40 Code of Federal Regulations (CFR) Part 261 because the piles were sent off site for reclamation. Piles of excavated limestone/soil were not on site during the VSI. Mr. Norman Sester feels that over 90 percent of the facility area has a total lead concentration of less than 5 mg/kg. The other 10 percent of SWMU 1 has not been remediated. This is based on the soil analysis that he performed on the facility area while he was excavating the limestone and soil. This soil sampling data is not available. No further remediation has occurred on site.

2.5 REGULATORY HISTORY

The SS facility was identified to the Illinois Environmental Protection Agency (IEPA) through various citizen complaints (IEPA, 1978a; 1978b; 1978c; 1978d; 1980; 1982; 1983a; 1983b; 1983c; 1983d; 1983e; 1983f; 1983g). The facility is currently nonregulated. SS never filed an EPA Notification of Hazardous Waste Activity form or a Part A Permit application. File information indicated that the Rockford Office of IEPA filed a Notification of Hazardous Waste Activity for the SS facility with EPA. IEPA treated the SS facility as if it was an interim status TSD facility (IEPA, 1984a; 1985a; 1985f; 1986b; 1986e; PRC Engineering, 1986). If the SS facility was reclaiming

lead/acid batteries today it would be regulated according to 40 CFR Part 266.80, Subpart G. All sections of 40 CFR Part 266.80 went into effect on July 5, 1985. Prior to this amendment to 40 CFR Part 266 lead/acid battery reclaiming facilities were not regulated by EPA (NARA, 1991). A January 10, 1985 RCRA Inspection Report for Interim Status Standards indicated that lead/acid battery reclaiming operations at the SS facility had ceased prior to the inspection. Lead/acid battery reclaiming operations would not resume until operating permits were obtained from IEPA Division of Air Pollution Control (DAPC) and DWPC (IEPA, 1985a). File information indicates that lead/acid battery reclamation did not resume any time after January 1985. The SS facility was used to store whole lead/acid batteries for sale to other reclaimers. Under 40 CFR Part 266.80, facilities which store spent batteries, but do not reclaim them, are not subject to regulation (NARA, 1991). The facility operated as a nonpermitted battery reclaimer from 1972 to 1985. However, as confirmed in a telephone conversation between RAI and IEPA on December 15, 1992, EPA and IEPA had, at some time in the past, determined that the facility was never subject to RCRA interim status standards (IEPA, 1992). Currently, the facility does not handle any hazardous materials and it is being used to store equipment and machinery that Mr. Sester purchased for resale. Hazardous materials and constituents are believed to be located on site.

Norman Sester applied for air, land, and water operating permits for his facility through IEPA. Mr. Sester was denied these permits by IEPA (IEPA, 1985e).

IEPA required the SS facility to file a closure plan for the lead/acid battery reclamation because IEPA treated the SS facility as an interim status TSD facility (IEPA, 1985a). A Pre-Enforcement Conference (PEC) was held in March of 1985. As a result of the PEC, Mr. Sester agreed to submit a closure plan for the facility (IEPA, 1985b; 1985c). SS hired Engineering Enterprises, Inc. (EEI) to prepare the closure plan for the facility (EEI, 1985; 1986a; 1986b; 1988). A modified closure plan was approved by IEPA (IEPA, 1986f). Closure was not completed according to the closure plan. Mr. Sester removed some contaminated soil. Mr. Sester requested that the closure standards for the lead in the soils be raised from 0.1 mg/kg lead to 5.0 mg/kg. IEPA refused the request (IEPA, 1987; Sester 1985b). Due to health and financial difficulties incurred by Mr. Sester, closure activities ceased at this facility before the cleanup was completed (IEPA 1984b; 1985b; 1985c; 1985d; 1985g; 1985h; 1985j; 1985k; 1986d; 1986f; 1987; 1988; Sester 1985a; 1985b). However, as confirmed in a telephone conversation between RAI and IEPA on December 15, 1992,

completion of closure activities for the SS facility was not required by IEPA due to the determination that the facility was exempt from RCRA interim status standards (IEPA, 1992).

In the past, the SS facility had several compliance problems. Currently there are no RCRA violations existing at this facility (IEPA, 1990). The past compliance violations were related to facility closure, waste management at the facility, and permit negligence. On April 21, 1986, IEPA referred the SS facility to EPA for a Compliance Order. EPA concluded, on May 22, 1986, that a Compliance Order was not appropriate. This conclusion was based on the determination that the excavated limestone/soil piles were not a waste management landfill and that the wastes in the piles were exempt from regulation by the language of 35 Illinois Administrative Code (IAC) 721.106, which was in effect during the time that the piles were present (IEPA, 1984b; 1985b; 1985c; 1985d; 1985g; 1985h; 1985i; 1986a; 1986c; 1990; EPA, 1986). The SS facility did not hold an NPDES permit or any other type of permit.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the SS facility.

2.6.1 Climate

The climate in DeKalb County is typically continental with cold winters, warm summers, and frequent brief fluctuations in the temperature, humidity, cloudiness, and wind direction (Ruffner, 1985). The average daily temperature is 48.6 degrees Fahrenheit (°F). The lowest daily temperature is 10.6°F in January. The highest daily temperature is 84.9°F in July.

The total annual precipitation for the county is 35.2 inches. The mean annual lake evaporation for the area is about 30 inches (USDC, 1968). The 1-year, 24-hour maximum rainfall recorded in the area over the last 25 years is about 5.06 inches (Ruffner and Bair, 1985).

The prevailing wind is from the south-southwest with an average wind speed of 10 miles per hour. Average wind speed is highest in March at 11.8 miles per hour from the west-northwest

(NOAA, 1990). The wind direction and speed were recorded from the National Weather Service office in Rockford, Illinois. This office is 30 miles northwest of DeKalb. The DeKalb weather service substation does not have wind information on record.

In winter, about one-half of the precipitation, or 10 percent of the annual total, falls as snow. During the fall, winter, and spring, the pattern of precipitation tends to be more uniform over both time and distance, whereas in the summer rainfall is often locally heavy and variable.

2.6.2 Flood Plain and Surface Water

The SS facility is located in a Zone A, 100-year, flood plain. This is an area with greater than 1 percent chance of flooding in any given year (FEMA, 1987).

The nearest surface water body, Bull Run stream, is located approximately 400 feet west of the facility and is used for agricultural and recreational purposes. Bull Run stream is a tributary to the South Branch of the Kishwaukee River (USGS, 1968). The South Branch of the Kishwaukee River flows west and north and is located approximately 0.3 mile north of the SS facility. The South Branch of the Kishwaukee River flows west then north of Kirkland, Illinois, and joins the Kishwaukee River approximately 10 miles downstream. The Kishwaukee River is a tributary to the Rock River and converges with it approximately 8 miles downstream of the confluence that makes the South Branch of the Kishwaukee River. The Rock River ultimately discharges into the Mississippi River.

2.6.3 Geology and Soils

The soils at the SS facility consists of Elburn silt loam series, which consist of nearly level soil in outwash areas or in the depressed centers of large, raised, circular mounds. The surface layer is very dark brown to very dark grayish-brown silt loam and silty clay loam about 14 inches thick. The subsoil is about 46 inches thick and consists of silty clay loams and light clay loams. In the spring the water table is generally 1 to 3 feet below the surface. Soils of the Elburn silt loam series have a permeability of 0.6 to 2.3 inches per hour and an available water capacity of 0.14 to 0.24 inch per inch of soil. Surface runoff is slow, and the hazard of erosion is slight. This soil is intensively farmed and is well suited to grow crops (USDA, 1978).

The facility area is underlain by approximately 60 feet of glacial drift of the Pleistocene Series (IDENR, 1985). During the Wisconsin glacial events, the Kirkland area was covered by glaciers. When the glaciers receded, the melting ice deposited unsorted rock debris in a clay matrix, which is known as till. The glacial drift in the SS facility area consists of dark brown soil, gravel up to 0.5 inch in diameter, sand, and grayish-orange silty till. The bulk of the glacial deposits in the region are tills, although some glacial outwash and modern stream deposits (sands and gravels) are also present.

The uppermost bedrock unit beneath the facility is the Galena Formation of the Ordovician System. At this location, the Galena Formation consists of 87 feet of yellowish orange to light yellowish gray, partly cherty dolomite (IDENR, 1985). The Galena Formation is underlain by 28 feet of yellowish gray, fine to coarse dolomite of the Decorah Formation in the Ordovician System. The next deepest bedrock unit is 125 feet of partly argillaceous, yellowish gray to yellowish orange or gray, fine to coarse Ordovician dolomite of the Platteville formation. This is underlain by 50 feet of firm shale, fine dolomite, and incoherent fine and coarse sandstone of the Glenwood Formation of Ordovician age. The Glenwood Formation is underlain by at least 280 feet of incoherent fine to coarse, white to gray, sandstone with silty zones of the St. Peter Formation (IDENR, 1985). Beneath the Ordovician rocks are Cambrian dolomite, sandstones and shales, including the Iron-ton-Galesville and the Mount Simon sandstones. Precambrian crystalline basement underlies these rocks. The thickness of, and depths to the Cambrian and Precambrian rocks are not known (Hackett and Bergstrom, 1956).

2.6.4 Ground Water

The shallowest aquifer underneath the SS facility is glacial drift of the Pleistocene Series. Ground water is approximately one to three feet below the surface in this aquifer (USDA, 1978). The glacial deposits are approximately 60 feet thick in the facility area (IDENR, 1985). This aquifer can yield moderate amounts of ground water from the sand and gravel lenses found in the Pleistocene deposits. In general, ground water is believed to flow north towards the South Branch of the Kishwaukee River (USGS, 1968).

The next aquifer is the bedrock units of the Ordovician System. This aquifer is at least 576 feet below ground surface in the facility area. The Village of Kirkland installed a public water supply

distribution system in this aquifer in 1928. This water system operated on a railroad well that was owned by the Chicago, Milwaukee, St. Paul, & Pacific Railroad Company from 1928 until 1951. The railroad well is finished in sandstone to a depth of 737 feet. In October of 1950, the Village of Kirkland installed Well No. 1, which is completed to a depth of 636 feet and finished in sandstone. In 1983, the maximum pumping rate was 154,000 gallons per day (gpd). A high volume of ground water can be pumped from this aquifer with very little drawdown and quick recovery (IDENR, 1985). Currently, the Village of Kirkland uses Well No. 1 for the public water supply, but the railroad well is available for emergency use. Water from Well No. 1 is chlorinated and fluorinated before distribution. A ground water sample collected from Well No. 1 on March 4, 1975, by IEPA, showed that there was no contamination in this aquifer in the vicinity of Well No. 1 (IDENR, 1985). The static water level of Well No. 1 was 16.8 feet in 1981 (IDENR, 1985). Well No. 1 is located 0.25 mile downgradient of the SS facility.

The deepest aquifer is the Ironton-Galesville and the Mount Simon Sandstones. Wells from these bedrock units may experience a significant reduction in permeability and water quality with depth (Hackett and Bergstrom, 1956). It is not known if this aquifer is used for drinking water within two miles of the facility.

2.7 RECEPTORS

The SS facility occupies 8,000 square feet in a mixed-use area in Kirkland, Illinois. Kirkland has a population of about 1,200 people.

The SS facility is bordered on the north by State Route 72 and then Kirkland Feed and Grain, on the west by the Kirkland Saw Mill, on the south by Rowin Street and a residence, and on the east by a building owned by the Kirkland Fire Department and then by South Sixth Street. The nearest school, Kirkland Community School, is located six blocks east and three blocks south of the facility. The nearest residence is approximately 60 feet south of the facility across Rowin Street. The building can be locked, but there is no security system or fencing at or around the facility. The building was not locked during the VSI.

The nearest surface water body, Bull Run stream, is located 400 feet west of the facility and is used for agricultural and recreational purposes. Bull Run stream is a tributary to the South Branch of the Kishwaukee River. Other surface water bodies in the area include the South Branch of the Kishwaukee River. The South Branch of the Kishwaukee River flows west and north and is located approximately 0.3 mile north of the SS facility (USGS, 1968). The South Branch of the Kishwaukee River flows west then north of Kirkland, Illinois, and joins the Kishwaukee River approximately 10 miles downstream. The Kishwaukee River is a tributary to the Rock River and converges with it approximately 8 miles downstream of the confluence that makes the South Branch of the Kishwaukee River.

Ground water is used as a municipal water supply. The municipal drinking water well is located less than 0.25 mile east of the facility. This well is located downgradient of the facility (USGS, 1968). Sensitive environments are not located on site. The nearest sensitive environment is a series of wetlands located directly northwest and northeast of the facility along the banks of the South Branch of the Kishwaukee River. There are many of these palustrine wetlands located within 2 miles of the facility (USDI, 1981). There are no national parks, forest preserves, or habitats of endangered species within 2 miles of the SS facility (USDI, 1989; USGS, 1968).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the two SWMUs identified during the PA/VSI. The following information is presented for the SWMUs: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and RAI's observations. Figure 2 shows the SWMU locations.

SWMU 1

Lead/Acid Battery Reclamation Area

Unit Description:

SWMU 1, the Lead/Acid Battery Reclamation Area, is identified as the property and building that occupy approximately 8,000 square feet, except for the sulfuric acid neutralization tanks. SWMU 1 is defined as this area because the lead/acid battery reclamation operations changed locations throughout history and exact locations were not determinable during the VSI. Piles of excavated limestone/soil were in the northwest area of the property. These piles of excavated limestone/soil were not on site during the VSI. These piles of excavated limestone/soil are not RCRA regulated under 40 CFR Part 261 because the piles went for reclamation. The SWMU was originally built as a gas station in the early 1940s. The unit consists of a building on the southern half of the parcel and a cement slab that is contiguous to the north side of the building and extends north towards Route 72. All other areas of the property are open soil or soil with some vegetation. The building is one story brick and has a flat roof. Inside the building there is one soil pipe to the Kirkland Sewer System that was used for the facility bathroom.

Date of Startup:

This unit began operation as a lead/acid battery reclaiming facility in 1972.

Date of Closure:

This unit is inactive. Lead/acid battery reclaiming operations ceased in 1985 at this unit. The unit has not undergone complete RCRA

closure as required by IEPA. However, as confirmed in a telephone conversation between RAI and IEPA on December 15, 1992, completion of closure activities for the SS facility was not required by IEPA due to the determination that the facility was exempt from RCRA interim status standards (IEPA, 1992).

Wastes Managed: This unit managed whole lead/acid batteries, lead cells and scrap lead, and plastic battery casings while operating as a lead/acid battery reclaimer. Ultimately, the lead plates and parts were sold to two lead smelters; National Lead in Chicago and USS Lead in East Chicago, Indiana. The shredded plastic casings were sold through the lead smelters to M.A. Polymers. The battery acid was neutralized by various methods and discharged into the Kirkland sewer system.

Release Controls: The unit has a concrete slab and the floor of the building is concrete. However, open areas of this SWMU include soil contaminated with lead. The unit does not have any secondary containment.

History of Documented Releases: IEPA DWPC surface water samples showed lead contamination of 30 mg/L and 75 mg/L. Area residents complained about red lead oxide (Pb_3O_4) blowing from piles of lead plates that were on-site. An IEPA field pH screening indicated a pH between 1 and 2 in on-site ponded liquid. This acidic surface water may have been straight acid from lead/acid battery reclamation. An IEPA analysis of a sample of material from excavated limestone and soils showed a total lead concentration of 29,470 mg/kg.

Observations: The interior of the building has new wall board on all walls. The inside of the building is used to store industrial, commercial, and personal equipment for resale by Norman Sester. The building has two garage doors and one entry door on the north side. Outside the

building on the north side there are some tires, miscellaneous equipment, and one battery. There was nothing stored along the east side of the building. A propane tank and a truck were along the south side of the building. A truck, an augur bit, and a truck topper were west of the facility building. RAI noted no evidence of release during the VSI (see Photographs No. 1 through 11).

SWMU 2

Sulfuric Acid Neutralization Tanks

Unit Description:

SWMU 2, the Sulfuric Acid Neutralization Tanks, is identified as the indoor inground stainless steel capture tank and the outdoor inground steel tank filled with limestone. During the VSI the location of the former indoor inground stainless steel capture tank was determined, but RAI was not able to determine the location of the former outdoor inground steel tank filled with limestone. The capacity of these tanks is not known. The original on-site acid neutralization system consisted of an outdoor inground steel tank filled with limestone which was connected to the Kirkland sewer system. This neutralization system was later modified by the addition of an indoor inground stainless steel capture tank. The stainless steel capture tank was hooked up to the limestone steel tank. The stainless steel capture tank was located indoors next to battery cutting or battery storage operations. Acid from the batteries was drained directly into this tank. Neutralization was performed in the stainless steel capture tank before the acid went to the limestone steel tank. The contents of the stainless steel capture tank were neutralized with potash and later with aqueous ammonia. Due to valving problems, the limestone steel tank was removed at an unknown date, and neutralization was conducted solely in the stainless steel capture tank. The stainless steel capture tank was then connected to the Kirkland sewer system.

Date of Startup: This unit began operation as a lead/acid battery reclaiming facility in 1972.

Date of Closure: This unit is inactive. Lead/acid battery reclaiming operations ceased in 1985 at this unit. Both of the tanks have been removed. There is no file information to indicate the date either tank was removed. IEPA is not requiring SS to complete closure for the tanks. As confirmed in a telephone conversation between RAI and IEPA on December 15, 1992, completion of closure activities for the SS facility was not required by IEPA due to the determination that the facility was exempt from RCRA interim status standards (IEPA, 1992).

Wastes Managed: This unit managed sulfuric acid while operating as a lead/acid battery reclaimer. The battery acid was neutralized by various methods and discharged into the Kirkland sewer system. No permits were obtained from the City of Kirkland.

Release Controls: The floor inside the building is concrete and the tank was constructed of stainless steel. The tank does not have any secondary containment. The outdoor tank was steel; it is not known if it had any release controls.

History of Documented Releases: There have been no documented releases from this unit.

Observations: The outdoor inground steel tank was removed prior to the facility ceasing the lead/acid battery reclaiming operations. The location of this former outdoor steel tank could not be determined during the VSI. The indoor stainless steel capture tank was removed as part of Norman Sester's closing of the lead/acid battery reclamation operation. The exact dates that the tanks were removed are not known. RAI noted no evidence of release (see Photograph No. 12).

4.0 AREAS OF CONCERN

RAI identified no AOCs during the PA/VSI. All documented releases occurred from SWMUs at this facility. There are no hazardous wastes currently being managed at the facility. However, it is possible that hazardous materials and constituents are present in on-site soils and ground water.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified two SWMUs at the SS facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are RAI's conclusions and recommendations for each SWMU. Table 3, at the end of this section, summarizes the two SWMUs at the facility and recommended further actions.

SWMU 1 Lead/Acid Battery Reclamation Area

Conclusions: SWMU 1, the Lead/Acid Battery Reclamation Area, is identified as the parcel and building that occupy approximately 8,000 square feet, except for the sulfuric acid neutralization tanks. SWMU 1 is defined as this area because the lead/acid battery reclamation operations changed locations throughout history and exact locations were not determinable during the VSI. RAI observed no hazardous materials on site during the VSI. The potential for release to environmental media is summarized below.

Ground Water: Currently, there is a moderate potential for a release to ground water from SWMU 1. In the past it is possible that there were releases to the ground water. Ground water monitoring has not been conducted at this facility. It is probable that the ground water in the facility area could have been contaminated with lead and sulfuric acid. This is due to past releases to soil as a result of the lack of organized waste management at the facility and the fact that there was inadequate containment of hazardous substances when the facility was in operation.

Surface Water: Currently, there is a moderate potential for a release to surface water from this unit. In the past IEPA, DWPC, took surface water runoff samples in a ditch that runs along the north side of the facility into Bull

Run stream. These surface water samples revealed lead levels of 30 mg/L and 75 mg/L. A field pH screening in on-site ponded surface water registered a pH between 1 and 2.

Air: The current potential for release is moderate. In the past there may have been a release of hazardous constituents to the air. Lead cells from lead/acid batteries were stored outside the building on the ground with no containment. Also, IEPA received complaints from area residents that red lead oxide (Pb_3O_4) was blowing from the piles of lead plates that were on site.

On-Site Soils: There has been a release to on-site soils at the SS facility. A field pH screening in on-site ponded surface water registered a pH between 1 and 2. An IEPA analysis of a sample taken during the inspection showed a total lead concentration of 29,470 mg/kg in limestone and soil material. Mr. Norman Sester feels that over 90 percent of the facility area has a total lead concentration of less than 5 mg/kg. This is based on the soil analysis that he performed on the facility area while he was excavating limestone and soil. This soil sampling data is not available. Residual contamination may still exist.

Recommendations: Although the facility is exempt from RCRA interim status standards, corrective actions for the facility may be pursued under regulations of the CERCLA program. RAI recommends that ground water and on-site soil sampling be conducted at SWMU 1. Also, RAI recommends surface water sampling for Bull Run stream. Ground water sampling is recommended because there has been a release to on-site soils and because the seasonal spring water table is generally 1 to 3 feet below the surface in Elburn silt loam soils. Surface water and on-site soil sampling is recommended because of the history of releases to the soil and surface water at the facility. RAI also recommends that a fence be constructed around the facility that limits the accessibility of the area.

SWMU 2

Sulfuric Acid Neutralization Tanks

Conclusions:

SWMU 2 is identified as the indoor inground stainless steel capture tank and the outdoor inground steel tank filled with limestone. Currently, the potential for a release to ground water, surface water, air, and on-site soils is low for this unit. This is because the SS facility stopped reclaiming lead/acid batteries in 1985. The outdoor inground steel tank was removed prior to the facility ceasing the lead/acid battery reclaiming operations. The location of this former outdoor steel tank could not be determined during the VSI. The indoor stainless steel capture tank was removed as part of Norman Sester's closing of the lead/acid battery reclamation operation. RAI observed that there were no hazardous materials on site during the VSI.

Recommendations:

RAI recommends no further action for this unit. These tanks have been removed from the SS facility and there has been no documented release from them.

RELEASED
DATE 6/1/01
RIN #
INITIALS mv

ENFORCEMENT
CONFIDENTIAL

TABLE 3
SWMU SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Lead/Acid Battery Reclamation Area	1972 to 1985	In the past there have been documented releases to surface water (October 1983 and October 1984) and on-site soils (January 1985).	RAI recommends that ground water and soil sampling be conducted at this unit. Also, RAI recommends surface water sampling for Bull Run stream due to the history of releases to soil and surface water at the facility. RAI also recommends that a fence be constructed around the facility that limits the accessibility of the area.
2. Sulfuric Acid Neutralization Tanks	1972 to 1985	None	RAI recommends no further action for this unit.

RELEASED
DATE 6/1/01
RIN #
INITIALS

REFERENCES

- Engineering Enterprises, Inc. (EEI), 1985. Closure/Post-Closure Application, October 7.
- EEI, 1986a. Closure Plan for Sester and Son, January 30.
- EEI, 1986b. Revised Closure Plan for Sester and Son, March 31.
- EEI, 1988. Letter to Lawrence W. Eastep, DLPC, IEPA, requesting extension of time to complete closure, February 2.
- Federal Emergency Management Agency (FEMA), 1987. Village of Kirkland, Illinois, Community-Panel Number 170186 001 C, Flood Insurance Rate Map, National Flood Insurance Program.
- Hackett, J.E., and R.E. Bergstrom, 1956. Groundwater in Northern Illinois, Illinois State Geological Survey, Circular 207, Urbana, Illinois.
- Illinois Department of Energy and Natural Resources (IDENR), 1985. Preliminary draft of Bulletin 60 public water supply for the Village of Kirkland, DeKalb County, Illinois.
- Illinois Environmental Protection Agency (IEPA), 1978a. Division of Land Pollution Control (DLPC) Complaint Investigation, August 23.
- IEPA, 1978b. DLPC Complaint Investigation, September 12.
- IEPA, 1978c. DLPC Telephone Conversation with Norman Sester, September 18.
- IEPA, 1978d. DLPC Telephone Conversation with Norman Sester, September 22.
- IEPA, 1980. DLPC Complaint Investigation, December 16.
- IEPA, 1982. DLPC Complaint Investigation, April 26.
- IEPA, 1983a. DLPC Complaint Investigation, January 31.
- IEPA, 1983b. DLPC Telephone Conversation with Bob Drake, DeKalb County Health Department, March 3.
- IEPA, 1983c. DLPC Telephone Conversation with Charles Fruit, Wastewater Plant Operations, City of Kirkland, March 3.
- IEPA, 1983d. Memorandum to File from Pamela D. LoPinto, DLPC, April 12.
- IEPA, 1983e. DLPC Complaint Investigation, September 8.
- IEPA, 1983f. Memorandum to File from Pamela D. LoPinto, DLPC, October 20.

IEPA, 1983g. Memorandum to File from Dennis J. Connor, Division of Water Pollution Control (DWPC), October 21.

IEPA, 1984a. RCRA Inspection Report, Interim Status Standards, October 9.

IEPA, 1984b. Compliance Inquiry Letter (CIL) to Norm Sester, October 29.

IEPA, 1985a. RCRA Inspection Report, Interim Status Standards, January 10.

IEPA, 1985b. Pre-Enforcement Conference Letter (PECL) to Norman Sester, March 7.

IEPA, 1985c. Memorandum to File concerning the Pre-Enforcement Conference (PEC) from P.M. Luedtke, March 27.

IEPA, 1985d. CIL to Sester and Son, April 5.

IEPA, 1985e. Letter of Permit Denial to Sester and Son, June 3.

IEPA, 1985f. RCRA Facility Inspection Form for Compliance With Interim Status Standards Covering Ground Water Monitoring, July 26.

IEPA, 1985g. CIL to Norman Sester, August 6.

IEPA, 1985h. PECL to Norman Sester, September 10.

IEPA, 1985i. Memorandum to File concerning the PEC from Pat Luedtke and Dave Retzlaff, September 25.

IEPA, 1985j. Letter to Engineering Enterprises, Inc. regarding the Closure/Post-Closure Application, October 22.

IEPA, 1985k. Letter to Norman Sester granting additional time to complete the closure plan, December 19.

IEPA, 1986a. Memorandum to the Enforcement Decision Group (EDG) from Patricia Luedtke, David S. Retzlaff, and Robert Wengrow, January 17.

IEPA, 1986b. RCRA Inspection Report, Interim Status Standards, January 30.

IEPA, 1986c. Memorandum to the EDG from David S. Retzlaff and Robert Wengrow, February 10.

IEPA, 1986d. Model Facility Management Plan for Sester and Son, prepared by J. Virgilio, March 24.

IEPA, 1986e. Letter of Request for Compliance Order to United States Environmental Protection Agency (U.S. EPA), April 21.

IEPA, 1986f. Letter to Sester and Son approved Modified Closure Plan, May 1.

- IEPA, 1987. Letter to Sester and Son refusing the request to modify the closure plan, August 14.
- IEPA, 1988. Letter to Sester and Son granting extension of time to complete closure, May 5.
- IEPA, 1990. Memorandum to Scott Phillips, EDG, from Paul Jagiello regarding enforcement action at Sester and Son, November 2.
- IEPA, 1992. Telephone conversation between Robert Wengrow, IEPA, and John Wong, RAI, regarding the regulatory status of Sester and Son, December 15.
- PRC Engineering, 1986. Loss of Interim Status Inspection Report-Checklist, April 21.
- National Archives and Records Administration (NARA), 1991. 40 Code of Federal Regulations parts 260 to 299, U.S. Government Printing Office, July 1.
- National Oceanic and Atmospheric Administration (NOAA), 1990. Local Climatological Data: Annual Summary with Comparative Data: Rockford, Illinois.
- Ruffner, James A., 1985. Climates of the States, third edition, Volume 1, Gale Research Company, Detroit, Michigan.
- Ruffner, James A. and Frank E. Bair, 1985. Weather of United States Cities, Volume 1, Gale Research Company, Detroit, Michigan.
- Sester, Norman, 1985a. Letter to IEPA, DLPC, answers to CIL, January 2.
- Sester, Norman, 1985b. Request for an extension of time to complete the closure plan, November 27.
- United States Department of Agriculture (USDA), 1978. Soil Survey of DeKalb County, Illinois, Soil Conservation Service, May.
- United States Department of Commerce (USDC), 1968. Climatic Atlas of the United States, United States Government Printing Office, Washington, D.C.
- United States Department of the Interior (USDI), 1981. National Wetlands Inventory Map for Kirkland, Illinois, 7.5-minute topographic series.
- USDI, 1989. Revised Section 7 Species/County List for Region 3, Division of Endangered Species, Fish and Wildlife Service, March 20.
- United States Environmental Protection Agency (EPA), 1986. Letter to Gary P. King, DLPC, IEPA, regarding the referral for Compliance Order, May 22.
- United States Geological Survey (USGS), 1968. Kirkland Quadrangle, Illinois, 7.5-minute topographic series.

ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE IL 02 SITE NUMBER ILD 106 923 360

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Sester and Son	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 602 West Main (State Route 72)				
03 CITY Kirkland	04 STATE IL	05 ZIP CODE 60146	06 COUNTY DeKalb	07 COUNTY CODE	08 CONG DIST
09 COORDINATES: LATITUDE 42° 5' 26" N		LONGITUDE 088° 51' 12.5" W			
10 DIRECTIONS TO SITE (Starting from nearest public road) Route 72 west into Kirkland. The site is on Route 72 (Main Street) one block east of the gas station and on the south side of the road.					

III. RESPONSIBLE PARTIES

01 OWNER (If known) Norman Sester	02 STREET (Business, mailing residential) R.R.1 P.O. Box 34				
03 CITY Kingston	04 STATE IL	05 ZIP CODE 60146	06 TELEPHONE NUMBER (815) 784-6201		
07 OPERATOR (If known and different from owner) Same as owner	08 STREET (Business, mailing, residential)				
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER (Specify) <input type="checkbox"/> G. UNKNOWN					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input type="checkbox"/> A. RCRA 3010 DATE RECEIVED: / / <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: / / <input checked="" type="checkbox"/> C. NONE MONTH DAY YEAR MONTH DAY YEAR					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

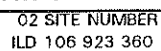
01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 06 / 18 / 92 <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: (Specify) CONTRACTOR NAME(S): Resource Applications, Inc.	
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN	03 YEARS OF OPERATION 1972 1985 BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN		
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Whole lead/acid batteries, lead cells from batteries, plastic casings, and sulfuric acid (H ₂ SO ₄).			
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION IEPA DWPC, surface water samples showed lead contamination of 30 mg/l and 75 mg/l. Area residents complained about red lead oxide (Pb ₃ O ₄) blowing from piles of lead plates that were on-site. An IEPA field pH screening indicated a pH between 1 and 2 in on-site ponded water. An IEPA analysis of a sample of material from excavated limestone/soils showed a total lead concentration of 29,470 mg/kg.			

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.) <input checked="" type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input type="checkbox"/> C. LOW (Inspect on time-available basis) <input type="checkbox"/> D. NONE (No further action needed; complete current disposition form)			
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VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard	02 OF (Agency/Organization) EPA Region V		03 TELEPHONE NUMBER (312) 886-4448	
04 PERSON RESPONSIBLE FOR ASSESSMENT Tony Dominic	05 AGENCY	06 ORGANIZATION Resource Applications, Inc.	07 TELEPHONE NUMBER (312) 332-2230	08 DATE 08 / 19 / 92 MONTH DAY YEAR



<input checked="" type="checkbox"/> A. TOXIC	<input type="checkbox"/> H. IGNITABLE
<input checked="" type="checkbox"/> B. CORROSIVE	<input type="checkbox"/> I. HIGHLY VOLATILE
<input type="checkbox"/> C. RADIOACTIVE	<input type="checkbox"/> J. EXPLOSIVE
<input type="checkbox"/> D. PERSISTENT	<input checked="" type="checkbox"/> K. REACTIVE
<input checked="" type="checkbox"/> E. SOLUBLE	<input type="checkbox"/> L. INCOMPATIBLE
<input type="checkbox"/> F. INFECTIOUS	<input type="checkbox"/> M. NOT APPLICABLE
<input type="checkbox"/> G. FLAMMABLE	

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE			
SOL	SOLVENTS			
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS	12,000	Batteries/Year	Sulfuric Acid 1972-1985
BAS	BASES			
MES	HEAVY METALS	12,000	Batteries/Year	Lead 1972-1985

[illegible]

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

Illinois Environmental Protection Agency (IEPA) and Region 5 RCRA files.



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND
INCIDENTS

I. IDENTIFICATION

01 STATE IL	02 SITE NUMBER ILD 106 923 360
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II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 1200 04 NARRATIVE DESCRIPTION

There is a potential for ground water contamination at this facility. There has been a release to on-site soils and the spring water table is generally one to three feet feet below the surface in Elburn silt loam soils (see sections 2.4, 2.6.3, and 2.6.4 in the narrative).

01 ☒ B. SURFACE WATER CONTAMINATION 02 ☒ OBSERVED (DATE: 1/10/85) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 1200 04 NARRATIVE DESCRIPTION

There is a potential for continuing surface water contamination at this facility. There has been a documented release to surface water. Surface water samples in a ditch along the north side of facility revealed lead levels of 30 mg/l and 75 mg/l. In 1985, pH screening of on-site ponded surface water indicated a pH between 1 and 2 (see sections 2.4, 2.6.2, and 2.7 in the narrative).

01 ☒ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 1200 04 NARRATIVE DESCRIPTION

In the past, there was a potential for air contamination at this facility. Area residents complained about red lead oxide (Pb_3O_4) blowing from piles of lead plates that were on site. Due to documented on-site soil contamination a continuing potential for release to air exists at this site (see sections 2.4, 2.7, and 3.0 in the narrative).

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

There is no record or current potential for fire/explosive conditions at this facility.

01 ☒ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 1200 04 NARRATIVE DESCRIPTION

There is a potential for direct contact with contaminants at this facility. Surface water samples showed lead contamination of 30 mg/l and 75 mg/l. Area residents complained about red lead oxide (Pb_3O_4) blowing from piles of lead plates that were on-site. An IEPA field pH screening indicated a pH between 1 and 2 in on-site ponded water. An IEPA analysis of a sample of material from excavated limestone/soils showed a total lead concentration of 29,470 mg/kg (see sections 2.4, 2.7, and 3.0 in the narrative).

01 ☒ F. CONTAMINATION OF SOIL 02 ☒ OBSERVED (DATE: 10/09/84) ☐ POTENTIAL ☐ ALLEGED

03 AREA POTENTIALLY AFFECTED: 0.18
(Acres) 04 NARRATIVE DESCRIPTION

There has been contamination of on-site soils at this facility. In 1985, pH screening of on-site ponded surface water indicated a pH between 1 and 2. An IEPA analysis of a sample of material from excavated limestone/soils showed a total lead concentration of 29,470 mg/kg (see sections 2.4, 2.6.3, and 3.0 in the narrative).

01 ☒ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 1200 04 NARRATIVE DESCRIPTION

There is a potential for drinking water contamination at this facility. The village of Kirkland has a well in the bedrock aquifer at 636 feet finished in sandstone. It is unlikely that any contaminants at this facility could migrate into the bedrock aquifer. It is possible that some residences outside the Village of Kirkland corporate limits draw water from the shallow glacial drift aquifer. The shallow glacial drift aquifer is more susceptible to contamination from this facility. Documented soil contamination is present at the facility (see sections 2.4, 2.6.3, and 2.6.4 in the narrative).

01 ☐ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 WORKERS POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

There is no record or current potential for worker exposure an injury at this facility.

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

There is no prior documentation of, or current potential for, population exposure or injury at this facility.



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND
INCIDENTS

I. IDENTIFICATION

01 STATE IL	02 SITE NUMBER ILD 106 923 360
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II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

There are no documented incidents or current potential for damage to flora at this site. Flora appeared undamaged during the VSI.

01 ☐ K. DAMAGE TO FAUNA 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

There are no documented incidents or current potential for damage to fauna at this site. Fauna appeared undamaged during the VSI.

01 ☒ L. CONTAMINATION OF FOOD CHAIN 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

Hazardous constituents from this site could affect flora and fauna through bioaccumulation in the food chain.

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

There are no documented incidents for unstable containment of waste at this site. Sound waste management practices were not practiced at this site, therefore the whole site could be considered unstable.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

There is a potential for continuing surface water contamination at this facility. There has been a documented release to surface water. Surface water samples in a ditch along the north side of facility revealed lead levels of 30 mg/l and 75 mg/l. In 1985, pH screening of on-site ponded surface water indicated a pH between 1 and 2. In the past, there was a potential for air contamination at this facility. Area residents complained about red lead oxide (Pb_3O_4) blowing from piles of lead plates that were on site. Soil contamination is present on-site and there is still a potential for damage to off-site property.

01 ☒ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS ☐ OBSERVED (DATE: __) ☒ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

In the past, there was a potential for contamination of the Village of Kirkland's sewers. Sulfuric acid was treated through various means during lead/acid battery reclamation and the effluent was discharged to the sewer system. This effluent could also have contained lead (see sections 2.3 and 3.0 in the narrative).

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

There are no documented or current incidents of illegal or unauthorized dumping at this site.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

There are no other known, potential, or alleged hazards at this site.

III. TOTAL POPULATION POTENTIALLY AFFECTED: 1200

IV. COMMENTS

V. SOURCES OF INFORMATION (Cite specific references; e.g., state files, sample analysis, reports)

Illinois Environmental Protection Agency (IEPA) and EPA Region 5 RCRA files.

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Sester and Son
602 West Main Street
Kirkland, Illinois 60146
ILD 106 923 360

Date: June 18, 1992

Primary Facility Representative: Norman Sester
Representative Telephone No.: (815) 784-6201
Facility Telephone No.: (815) 522-6300
Additional Facility Representatives: None

Inspection Team: Tony Dominic, Resource Applications, Inc. (RAI)
John Wong, RAI

Photographer: Tony Dominic, RAI

Weather Conditions: Sunny, clear, and calm with a temperature about 73°F

Summary of Activities: The visual site inspection (VSI) began at 9:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, and release history.

The VSI tour began at 10:15 a.m. The tour included a walk through of the facility and the parcel of land, SWMU 1. The inspection team noted the location of SWMU 2. The inspection team noted that none of the equipment that had been used for lead/acid battery reclaiming was on site. No remediation operations were being conducted while the inspection team was on site. The building is used to store equipment for resale. The interior of the building is being remodeled to store equipment by Mr. Sester.

The tour concluded at 11:10 a.m. after which the inspection team held an exit meeting with the facility representative. The VSI was completed and the inspection team left the facility at 11:20 a.m.



Photograph No. 1

Orientation: South

Description: Inside the facility building showing part of the south wall.

Location: SWMU 1

Date: 6/18/92



Photograph No. 2

Orientation: West

Description: Inside the facility building showing the southwest corner of the building.

Location: SWMU 1

Date: 6/18/92



Photograph No. 3

Location: SWMU 1

Orientation: Northeast

Date: 6/18/92

Description: Inside the facility building showing the northwest corner of the building.



Photograph No. 4

Location: SWMU 1

Orientation: North

Date: 6/18/92

Description: Inside the facility building showing the northwest section of wall.



Photograph No. 5

Orientation: North

Location: SWMU 1

Date: 6/18/92

Description: Inside the facility building showing the soil pipe from the bathroom to the Kirkland sewer system.



Photograph No. 6

Orientation: Southeast

Location: SWMU 1

Date: 6/18/92

Description: Inside the facility building showing the area which used to be an office.



Photograph No. 7

Location: SWMU 1

Orientation: Northeast

Date: 6/18/92

Description: Outside of the building on the north side showing the cement pad and Route 72. This is part of the area where the limestone gravel and soil was excavated.



Photograph No. 8

Location: SWMU 1

Orientation: West

Date: 6/18/92

Description: Outside of the building. Note Route 72 along the north side. This is part of the area where the limestone gravel and soil was excavated.



Photograph No. 9
 Orientation: Southwest
 Description: Panorama of the front of the building.

Location: SWMU 1
 Date: 6/18/92



Photograph No. 10
 Orientation: Southeast
 Description: Panorama of the front of the building.

Location: SWMU 1
 Date: 6/18/92



Photograph No. 11
 Orientation: South
 Description: SS facility showing the whole parcel and buildings.

Location: SWMU 1
 Date: 6/18/92



Photograph No. 12
 Orientation: South
 Description: Inside the facility buildings showing the former location of the Sulfuric Acid Neutralization Tank.

Location: SWMU 2
 Date: 6/18/92



Photograph No. 13
Orientation: South
Description: Bull Run stream on the south side of Route 72.

Location:
Date: 6/18/92

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

June 18, 1992

VSI - SESTER + SON - former battery
reclamation

arrived 8³⁰ - 9¹⁰ AM
interviewed Norman Sester

history - purchase date of facility
was early 1940's - initially,
facility was gas station
owned by Warren Carlson

N. Sester acquired site in 1972
as a gas station but operated it
as battery storage / processing
'til '85.

Volume - 12 K batt'y / year

Current use of facility: Storage of
Industrial, misc. equipment
- facility has same phone # as
Preferred Food Corp. (elev).

Since 1985 = facility used for storage.
Still the same bldg.

description of operation

- Some sold whole batteries
- Some cut-off and removed cells; sold dif. parts plastic + lead
- Hammermill used to grind plastic, then sold plastic
- trailer used to store plastic

MA Polymers was one client who purchased plastic

- tank inside in ground but not totally underground with (cut) open top? - connected to city sewer (discharged)
- lead plates stored on trailers
- used anhydrous NH_3 , lime and soda ash to neutralize H_2SO_4 from batteries
- settling problem (lead?) wanted to use H_2SO_4 in fertilizer appk

6/18

Sister (cont'd)

- lead was sold to Nat'l Lead and also a smelter in E. Chicago,
- plastic - some sold to above mentioned smelters - also to someone in Chicago
- Norm will provide names (call back)
- NiCd batt'y were given away, when available

Standard Q's - (answers per Norm's notes)

employees = 2, occasionally 3
(including Norm)

no security fences

never any PCBs

no asbestos, asbestos removal

nearest school - 6 blks east, 3 blks S
name - Kirkland Comm'ty School

nearest residence - 75 yds south
across street (72)

* actually ~ 20 yds from
facility.

w/in 6 mos. Norm will
get Tony's report from EPA
(less recommendations)

surrounding land use:

- currently, industrial uses due to Saw mill.
- Creek is west of facility off of Hwy 72
- Norm would like to blacktop in fall '92

Closure History -

"closure" due to ⁽²⁾ piles of excavation;
piles were taken to E. Chicago Comp
USS Lead

Samples

90% "under 5"
dug out at least 6" gravel

Rockford IEPA instructed to remove
Springfield IEPA opposed the motion?

never any solvents used
interview ended ~ 10 AM

6/18/95

Don Gesta Gesta

John Wong

Tony Dominic

Sunny, 73°F

Gas Station since early 1940's

Big Awned Women Carlsen

Don Possessor '72

↳ Gas Station

Battery Storage in 1972

Reclaimed until 1985?

Varied Quantity

12K batteries / yr.

Since 85 - Storage for equipt
Industrial

↳ in line - 1 - in

= Preferred Food Lamp.

Sold Whole or cut + ash cells
- out

// Hammermill:

Ground Plastic

MA Polymers

/ Tank inside building → Removed

↓

Battery Acid - Tank

Lead Plates → Dump truck

Flotation → separate plastic
+ rubber

Acid - Ammonia cyanide
Hot Lime

= Battery storage inside + outside
on pallets

Bat. Acid - always Neutralized

Pb - National Lead
+ East Chicago, IN

Plastic - Sold through Smelters

Indianapolis, IN
Chicago, IL

Will get me names

Batteries - Auto Lead/Acid
Industrial

↳ A few Ni/Cd batteries

Employees ~ 2 maybe 3

No Security

No PCBs

No Asbestos

//
Nearest School

6 blocks E

3 " 5

Kirkland Community School Dist

Nearest Residence

- 75 yds

N-5 Trees

E - " "

W. Saunder

S. Fine Dist.

East West of Facility

↳ Blacktop whole lot in
Fall of '98

Crane - Excavated Soil - High Wall

↓ 2 piles

Haul to smelter, East Chicago, Ind.

Both piles

↓
USS land.

90% all under 5 ppm

11

Soil Not Replaced

Leveled gravel / limestone

↓

is $\geq 6"$

Not Certified - Didn't follow CP

↓

last thing that has been done

is close excavation.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

June 15, 1992

Mr. Norman Sestor
R.R. 1
P.O. Box 34
Kingston, IL 60145

Re: Visual Site Inspection
Sestor and Sons
ILD 106 923 360

Dear Mr. Sestor:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.